

FILED
APR 04 2013
U. S. DISTRICT COURT
EASTERN DISTRICT OF MO

Defendant.

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) No.

4: 13CR00123RWS

COUNT ONE

**CURTIS FLANAGAN,
a/k/a Nycere Bey,**

In violation of, and punishable under, Title 18, United States Code, Section 915.

COUNT TWO

The Grand Jury further charges that:

On or about September 20, 2012, in St. Louis County, in the Eastern District of Missouri,
defendant,

**CURTIS FLANAGAN,
a/k/a Nycere Bey,**

with intent to defraud within the United States, did falsely assume and pretend to be a diplomatic consular and other official of a foreign government duly accredited as such to the United States, and acted as such, and in such pretended character did demand and obtain, and attempted to demand and obtain a thing of value, that is, Curtis Flanagan a/k/a Nycere Bey, while resisting lawful arrest by, and attempting to secure his release from, the St. Louis County Police Department, presented a forged and fraudulent "International Murrigan Gansul Nationality, Right to travel, non-obligatory identification card" that reads as follows, "Private Sovereign with Diplomatic Immunity" or words to that effect.

In violation of and punishable under, Title 18, United States Code, Section 915.

COUNT THREE

The Grand Jury further charges that:

On or about June 29, 2012, in St. Louis County, in the Eastern District of Missouri,
defendant,

**CURTIS FLANAGAN,
a/k/a Nycere Bey,**

with intent to defraud within the United States, did falsely assume and pretend to be a diplomatic consular and other official of a foreign government duly accredited as such to the United States,

and acted as such, and in such pretended character did demand and obtain, and attempted to demand and obtain a thing of value, that is, Curtis Flanagan, a/k/a Nycere Bey, while resisting lawful arrest by the St. Louis County, Police Department, repeatedly stated he had diplomatic immunity through the sovereign nation of the Mu'ur Republic and that "he was not required to obey United States laws due to his diplomatic immunity."

In violation of, and punishable under, Title 18, United States Code, Section 915.

A TRUE BILL.

FOREPERSON

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